

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,
MARISSA BLAIR, TYLER MAGILL, APRIL
MUNIZ, HANNAH PEARCE, MARCUS
MARTIN, NATALIE ROMERO, CHELSEA
ALVARADO, and JOHN DOE,

Plaintiffs,

v.

JASON KESSLER, RICHARD SPENCER,
CHRISTOPHER CANTWELL, JAMES
ALEX FIELDS, JR., VANGUARD
AMERICA, ANDREW ANGLIN,
MOONBASE HOLDINGS, LLC, ROBERT
“AZZMADOR” RAY, NATHAN DAMIGO,
ELLIOT KLINE a/k/a ELI MOSLEY,
IDENTITY EVROPA, MATTHEW
HEIMBACH, MATTHEW PARROTT a/k/a
DAVID MATTHEW PARROTT,
TRADITIONALIST WORKER PARTY,
MICHAEL HILL, MICHAEL TUBBS,
LEAGUE OF THE SOUTH, JEFF SCHOEP,
NATIONAL SOCIALIST MOVEMENT,
NATIONALIST FRONT, AUGUSTUS SOL
INVICTUS, FRATERNAL ORDER OF THE
ALT-KNIGHTS, MICHAEL “ENOCH”
PEINOVICH, LOYAL WHITE KNIGHTS OF
THE KU KLUX KLAN, and EAST COAST
KNIGHTS OF THE KU KLUX KLAN a/k/a
EAST COAST KNIGHTS OF THE TRUE
INVISIBLE EMPIRE,

Defendants.

Civil Action No. 3:17-cv-00072-NKM

JURY TRIAL DEMANDED

**PLAINTIFFS’ MOTION TO SEAL CERTAIN EXHIBITS TO PLAINTIFFS’ MOTION
FOR SANCTIONS AGAINST DEFENDANT VANGUARD AMERICA**

On April 16, 2019, the Court ordered that Plaintiffs “file complete and unredacted copies” of certain exhibits that Plaintiffs had referenced in their Motion for Sanctions Against Vanguard America.” (ECF No. 467.) The Court further stated that “[a]ll documents may be filed under seal in accordance with Local Rule 9.” (*Id.*) Accordingly, pursuant to the Court’s Order and for the reasons set forth below, Plaintiffs hereby respectfully request that the Court enter the enclosed proposed order sealing Exhibits 12, 26, and 33 to Plaintiffs’ Motion for Sanctions Against Defendant Vanguard America, which were submitted conditionally under seal today in this matter.

Exhibits 12 and 26 to Plaintiffs’ Motion for Sanctions Against Defendant Vanguard America were designated Highly Confidential by Defendant Vanguard America pursuant to the Order for the Production of Documents and Exchange of Confidential Information on January 3, 2018 (ECF No. 167). Although Plaintiffs reserve their right to challenge such designations, they submit this Motion in accordance with Local Rule 9 and request that Exhibits 12 and 26 be sealed. Additionally, pursuant to the contract the parties executed with the Third Party Discovery Vendor (as that term is defined in the Stipulation and Order for the Imaging, Preservation, and Productions of Documents, (ECF No. 383)), Exhibit 33 cannot not be disclosed except where disclosure to the Court is necessary for an application of relief, as it is here.

Dated: April 19, 2019

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on April 19, 2019, I filed the foregoing with the Clerk of Court through the CM/ECF system, which will send a notice of electronic filing to:

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*Counsel for Jeff Schoep, Nationalist Front,
and National Socialist Movement*

I further hereby certify that on April 19, 2019, I also served the following non-ECF participants, via U.S. mail, First Class and postage prepaid, addressed as follows:

Loyal White Knights of the Ku Klux Klan
a/k/a : Loyal White Knights Church of
the Invisible Empire, Inc.
c/o Chris and Amanda Barker
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Yanceyville, NC 27379

Andrew Anglin
P.O. Box 208
Worthington, OH 43085

Fraternal Order of the Alt-Knights
c/o Kyle Chapman
52 Lycett Circle
Daly City, CA 94015

Moonbase Holdings, LLC
c/o Andrew Anglin
P.O. Box 208
Worthington, OH 43085

East Coast Knights of the Ku Klux Klan
a/k/a East Coast Knights of the
True Invisible Empire
26 South Pine St.
Red Lion, PA 17356

Augustus Sol Invictus
9823 4th Avenue
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I further hereby certify that on April 19, 2019, I also served the following non-ECF participants, via electronic mail, as follows:

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